

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re: JEFFREY WINICK

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Chapter 7
Case No. 20-11976 (SHL)

Debtor.

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UNITED STATES OF AMERICA

-against-

Plaintiff,

Adversary No. 21-1138 (SHL)

JEFFREY WINICK

Defendant.

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DISCOVERY PLAN

The parties to the above-captioned adversary proceeding agree and stipulate to the following discovery plan:

1. Initial disclosures pursuant to Federal Rule of Bankruptcy Procedure 7026 shall be served no later than **August 20, 2021**.
2. Any motion to amend pleadings or to join additional parties shall be filed no later than **September 3, 2021**.
3. The parties shall conduct discovery in accordance with the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure, and the Local Rules of the Bankruptcy Court for the Southern District of New York, subject to the following schedule:
 - a. Initial interrogatories and documents requests shall be served by **September 10, 2021**.
 - b. All requests for admission shall be served by **January 28, 2022**.

- c. Unless extended by the Court for cause shown, all non-expert fact discovery, including responses to requests for admission and depositions of fact witnesses, shall be completed by **September 19, 2022**.
- d. Initial expert reports shall be served by **October 20, 2022**.
- e. Rebuttal expert reports shall be served by **November 18, 2022**.
- f. Expert depositions shall be taken by **December 16, 2022**.
- g. Unless extended by the Court for cause shown, all expert discovery shall be completed by **December 30, 2022**.

4. Any deposition may be conducted by video conference or other means agreeable to the parties and reasonable under the circumstances to ensure the health and safety of all persons attending the deposition.

5. The parties shall appear at a discovery status conference on **August 16, 2022 at 10:00 A.M.**

5. Except for the deadline contained in Paragraph 3(c) and (g) above, the parties may modify the deadlines set forth herein by mutual agreement or upon request and further order from the Court. The parties agree to act in good faith in discussing any extension to any such deadline. The deadline set forth in Paragraph 3(c) and (g) can be modified only upon request and further order from the Court.

Dated: July 13, 2022
New York, New York

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Dated: July 15, 2022

Dated: July 13, 2022
New York, New York

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/s/ Sean H. Lane
United States Bankruptcy Judge